

1 Victoria L. Nelson, Esq. (NV Bar No. 5436)  
 2 Email: [vnelson@nelsonhoumand.com](mailto:vnelson@nelsonhoumand.com)  
 3 Jacob L. Houmand, Esq. (NV Bar No. 12781)  
 4 Email: [jhoumand@nelsonhoumand.com](mailto:jhoumand@nelsonhoumand.com)  
 5 Kyle J. Ortiz, Esq. (NV Bar No. 14252)  
 6 Email: [kortiz@nelsonhoumand.com](mailto:kortiz@nelsonhoumand.com)  
 7 NELSON & HOUMAND, P.C.  
 8 1180 North Town Center Drive, Suite 100  
 9 Las Vegas, Nevada 89144  
 10 Telephone: 702/720-3370  
 11 Facsimile: 702/720-3371

**Electronically Filed On: July 10, 2017**

7 *Counsel for Shelley D. Krohn, Chapter 7 Trustee*

8 **UNITED STATES BANKRUPTCY COURT**

9 **DISTRICT OF NEVADA**

10 In re:

11 BRANDON MICHAEL D'HAENENS,

12 Debtor.

13 Case No. BK-S-16-16602-BTB  
 14 Chapter 7

**SECOND STIPULATION TO EXTEND  
 DEADLINE TO OBJECT TO DEBTOR'S  
 EXEMPTIONS PURSUANT TO  
 FEDERAL RULE OF BANKRUPTCY  
 PROCEDURE 4003**

15 Date of Hearing: N/A  
 16 Time of Hearing: N/A

17 Judge: Honorable Bruce T. Beesley<sup>1</sup>

18 SHELLEY D. KROHN, the duly appointed Chapter 7 Trustee in the above-captioned  
 19 bankruptcy case (the “Trustee”), by and through her counsel of record, Victoria L. Nelson, Esq.,  
 20 Jacob L. Houmand, Esq., and Kyle J. Ortiz, Esq. of the law firm of Nelson & Houmand, P.C., and  
 21 BRANDON MICHAEL D'HAENENS (the “Debtor”), by and through his counsel of record,  
 22 David J. Winterton, Esq. of the law firm David Winterton & Associates, Ltd. (the Trustee and the  
 23 Debtor shall be collectively referred to herein as the “Parties”), hereby stipulate and agree as  
 24 follows:

25 \_\_\_\_\_  
 26 <sup>1</sup> Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11  
 27 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The  
 28 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of  
 Bankruptcy Procedure will be referred to as “FRBP.” The Local Rules of Practice for the United  
 States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.

## I. RECITALS

1. On December 13, 2016, the Debtor filed a voluntary bankruptcy petition pursuant to Chapter 7 of Title 11 of the United States Code [ECF No. 1]<sup>2</sup>.

2. On December 13, 2016, the Trustee was appointed as the Chapter 7 Trustee in the Debtor's bankruptcy case [ECF No. 2].

3. On April 19, 2017, the Trustee concluded the Debtor's Section 341(a) Meeting of Creditors.

4. Accordingly, the initial deadline for the Trustee to object to the Debtor's exemptions was May 19, 2017.

5. On May 16, 2017, the Parties entered into a *Stipulation to Extend Deadline to Object to Debtor's Exemptions Pursuant to Federal Rule of Bankruptcy Procedure 4003* [ECF No. 67] (the “First Exemption Stipulation”).

6. The First Exemption Stipulation sought to extend the deadline for the Trustee to file an objection to the Debtor's exemptions from May 19, 2017, up to and including July 3, 2017.

7. On May 17, 2017, the Court entered an *Order Approving Stipulation to Extend Deadline to Object to Debtor's Exemptions Pursuant to Federal Rule of Bankruptcy Procedure 4003* [ECF No. 68].

8. On July 3, 2017, the Trustee filed a *Motion to Extend Deadline to File Objection to Debtor's Claim of Exemptions Pursuant to Federal Rule of Bankruptcy Procedure 4003* [ECF No. 70] (the “Motion to Extend”), which sought to extend the deadline to object to the Debtor’s exemptions from July 3, 2017, up to and including August 31, 2017.

9. The hearing date scheduled for the Motion to Extend is August 3, 2017.

10. The Parties have agreed to settle, among other things, any dispute concerning the Debtor's exemptions.

11. The Parties are in the process of finalizing a settlement agreement and now seek a further extension of the deadline for the Trustee to object to the Debtor's exemptions to allow the

<sup>2</sup> All references to “ECF No.” are to the numbers assigned to the documents filed in the case as they appear on the docket maintained by the clerk of the court.

Court to determine whether to approve the compromise pursuant to Federal Rule of Bankruptcy Procedure 9019.

12. The Parties also seek to vacate the hearing date on the Motion to Extend as the Parties have agreed to extend the deadline to object to the Debtor's exemptions.

## II. STIPULATION

**IT IS HEREBY STIPULATED AND AGREED** that the deadline for the Trustee to file an objection to the Debtor's exemptions shall be continued from **July 3, 2017**, up to and including **August 31, 2017**.

**IT IS FURTHERMORE HEREBY STIPULATED AND AGREED** that the hearing on the Motion to Extend scheduled for August 3, 2017, shall be vacated.

**IT IS FURTHER HEREBY STIPULATED AND AGREED** that this Stipulation is without prejudice to any of the Parties requesting a further extension of time from the Court for cause shown.

Dated this 10th day of July, 2017.

Dated this 10th day of July, 2017.

By: /s/ Jacob L. Houmand  
Victoria L. Nelson, Esq. (NV Bar No. 5436)  
Jacob L. Houmand, Esq. (NV Bar No. 12781)  
Kyle J. Ortiz, Esq. (NV Bar No. 14252)  
NELSON & HOUMAND, P.C.  
1180 North Town Center Drive, Suite 100  
Las Vegas, Nevada 89144  
*Counsel for Shelley D. Krohn, Chapter 7  
Trustee*

By: /s/ David J. Winterton  
David J. Winterton, Esq. (NV Bar No. 4142)  
DAVID WINTERTON & ASSOCIATES LTD.  
1140 N. Town Center Drive; Suite 120  
Las Vegas, Nevada 89144  
*Counsel for Chapter 7 Debtor*